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From:

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To:

Cc:

Subject: RE: Statute Extension Question

You don't need to open a TEFRA proceeding or keep the statute open at the partnership level in order to determine a partner's affected items such as the partner-level worthlessness loss. You only need to get a Form 872 from the partner (current version that also relates to affected items). For the purposes of the partner-level audit, however, you will be bound by how the partnership reported its items and reflected them in its books and records. See [Roberts v. Commissioner](#), 94 T.C. 853 at 860. You can solicit the information directly from the partner, or from the partnership for purposes of the partner-level audit.

